



MYSTY LANGFORD, ESQ.
Nevada Bar No. 16909
RICHARD HARRIS LAW FIRM
801 South Fourth Street
Las Vegas, Nevada 89101
P: (702) 444-4444
F: (702) 444-4455
E: mlangford@richardharrislaw.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SAMANTHA CHIAN, individually

Plaintiffs,

vs.

STATE FARM FIRE & CASUALTY
COMPANY; DOE INDIVIDUALS I through
X; and ROE CORPORATIONS I through X,
inclusive,

Defendants.

CASE NO.: 2:25-cv-00138-CDS-BNW

**AMENDED DISCOVERY PLAN AND
SCHEDULING ORDER**

(SPECIAL SCHEDULING REVIEW NOT
REQUESTED)

AND RELATED COUNTERCLAIM

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1(a), the parties submit their proposed Discovery Plan and Scheduling Order. Deadlines that fall on a Saturday, Sunday, or legal holiday have been scheduled for the next judicial day.

1. **Meeting:** Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on May 7, 2025, and was attended telephonically by Mysty Langford, Esq., of the Richard Harris Law Firm for Plaintiff, and Ashley E. Walters, Esq., of Messner Reeves, LLP for Defendant.
2. **Pre-Discovery Disclosures:** Plaintiff and Defendant have agreed that they will respectively serve their disclosures on or before May 21, 2025.

1 3. **Areas of Discovery:** The parties agree that the areas of discovery should include, but
2 not be limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil
3 Procedure.

4 4. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan.

5 A. **Discovery Cut-Off Date:**

6 The parties therefore request that the discovery period be set for 180 days,
7 calculated from the date of the Defendant's Answer, March 26, 2025, such that
8 discovery closes on September 23, 2025, which is 180 days from the date of the
9 filing of Defendant's Answer.
10

11 B. **Amending the Pleadings and Adding Parties:** The parties shall have until June
12 24, 2025, to file any motions to amend the pleadings and/or to add parties. This
13 date is 90 days before the discovery cut-off date.

14 C. **Fed. R. Civ. P. 26(a)(2) Disclosure of Experts:** Disclosure of expert shall
15 proceed according to Fed. R. Civ. P. 26(a)(2) and LR 26-1(b)(3) as follows:

- 16 i. The disclosure of experts and their reports shall occur on or before July
17 24, 2025. The expert disclosure deadline is 60 days before the discovery
18 cut-off date.
19 ii. The disclosure of rebuttal experts and their reports shall occur on or before
20 August 25, 2025. The rebuttal deadline is 32 days after the initial expert
21 disclosure deadline as the 30th day is Saturday August 23, 2025.

22 D. **Dispositive Motions:** The parties shall have until October 23, 2025, to file
23 dispositive motions. This is 30 days after the discovery cut-off date, as required
24 by LR 26-1(b)(4).

25 E. **Pre-Trial Order:** The parties will prepare a Consolidated Pre-Trial Order on or
26 before November 24, 2025, which is 32 days after the date set for filing
27 dispositive motions as the 30th day is Saturday, November 22, 2025. This deadline
28 will be suspended if dispositive motions are timely filed until 30 days after the



1 decision of the dispositive motions or until further Order of the Court. The
2 disclosures required by Fed. R. Civ. P. 26(a)(3), and objections thereto, shall be
3 included in the pre-trial order.

4
5 F. **Court Conferences:** If the Court has questions regarding the dates proposed by
6 the parties, the parties request a conference with the Court before entry of the
7 Scheduling Order. If the Court does not have questions, the parties do not request
8 a conference with the Court.

9 G. **Authorizations:** It is agreed that Plaintiff will provide Defendant with HIPAA
10 Compliant Authorizations for the Release of Patient Information pursuant to 45
11 CFR 164. The parties agree that in the event Plaintiff makes a claim for loss of
12 wages or lost earning capacity, Plaintiff shall provide: (1) Consent for Release of
13 Employment Information, left blank and (2) Authorization to Obtain Plaintiff's
14 Tax Return information.

15 H. **Format of Discovery:** Pursuant to the electronic discovery amendments to the
16 Federal Rules of Civil Procedure, the parties addressed the e-discovery issues
17 pertaining to the format of discovery at the Rule 26(f) conference. The parties do
18 not anticipate discovery of native files or metadata at this time, but each party
19 reserves the right to make a showing for the need of such electronic data as
20 discovery progresses.

21 I. **Alternative Dispute Resolution:** The parties certify that they have met and
22 conferred about the possibility of using alternative dispute resolution processes
23 including mediation, arbitration, and if applicable, early neutral evaluation.

24 J. **Alternative Forms of Case Disposition:** The parties certify that they considered
25 consent to trial by magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P.
26 73 and the use of the Short Trial Program (General Order 2013-01).

27 K. **Electronic Evidence:** The parties certify that they discussed whether they intend
28 to present evidence in electronic form to jurors for the purpose of jury

1 deliberations. The parties have not reached any stipulations in this regard at this
2 time.

3
4 DATED this 19th day of May 2025.

DATED this 20th day of May 2025.

5 **RICHARD HARRIS LAW FIRM**

MESSNER REEVES, LLP

6 /s/ Mysty Langford

/s/ Ashley E. Walters

7 MYSTY LANGFORD, ESQ.

ASHLEY E. WALTERS, ESQ.

8 Nevada Bar No. 16909

Nevada Bar No. 16338

9 801 South Fourth Street

8945 West Russell Road, Suite 300

10 Las Vegas, NV 89101

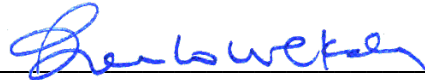
Las Vegas, NV 89148

11 *Attorneys for Plaintiff*

Attorneys for Defendant

State Farm Fire & Casualty Company

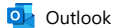
12 **IT IS SO ORDERED.**

13
14 

UNITED STATES MAGISTRATE JUDGE

15
16 **DATED:** May 23, 2025


RICHARD HARRIS
LAW FIRM



RE: Chian v. State Farm, et al. - 2:25-cv-00138-CDS-BNW - Discovery Plan

From Ashley E. Walters <AWalters@messner.com>

Date Tue 5/20/2025 11:00 AM

To Mysty D. Langford <mlangford@richardharrislaw.com>

Cc Karie Wilson <KWilson@messner.com>; Peggy Dale <PDale@messner.com>; Eric Siegler <esiegler@richardharrislaw.com>; Michael Madden <MMadden@messner.com>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sorry Mysty one small change. We should probably add in the caption that this is the Amended Discovery Plan and Scheduling Order. With that change you can affix my electronic signature.

Thanks,

ASHLEY E. WALTERS

Attorney

Messner Reeves LLP

O: 702.363.5100 E: awalters@messner.com

8945 W. Russell Road, Suite 300, Las Vegas, NV 89148

From: Ashley E. Walters

Sent: Tuesday, May 20, 2025 10:57 AM

To: Mysty D. Langford <mlangford@richardharrislaw.com>

Cc: Karie Wilson <KWilson@messner.com>; Peggy Dale <PDale@messner.com>; Eric Siegler <esiegler@richardharrislaw.com>; Michael Madden <MMadden@messner.com>

Subject: RE: Chian v. State Farm, et al. - 2:25-cv-00138-CDS-BNW - Discovery Plan

Hi Mysty,

This looks good to me. You may affix my electronic signature for filing.

Thanks,

ASHLEY E. WALTERS

Attorney

Messner Reeves LLP

O: 702.363.5100 E: awalters@messner.com

8945 W. Russell Road, Suite 300, Las Vegas, NV 89148

From: Mysty D. Langford <mlangford@richardharrislaw.com>

Sent: Monday, May 19, 2025 2:52 PM

To: Ashley E. Walters <AWalters@messner.com>

Cc: Karie Wilson <KWilson@messner.com>; Peggy Dale <PDale@messner.com>; Eric Siegler <esiegler@richardharrislaw.com>; Michael Madden <MMadden@messner.com>

Subject: Re: Chian v. State Farm, et al. - 2:25-cv-00138-CDS-BNW - Discovery Plan

[CAUTION: This Email is from an External Sender]

Ashley,

See attached.

Mysty D. Langford

Lawyer - Partner

Direct (702) 444-4367

Direct Dial - 702-444-4367

[Richard Harris Law Firm](#)

Las Vegas

801 South

4th Street Reno

Las Vegas 6900 S. McCarran Blvd., #1010

NV 89101 Reno NV 89509

Ph. (702) Ph. (775) 222-2222

444-

4444 x 297

[Defenders](#) [Ticket Busters](#)

Please read the [Legal Disclaimer](#) that governs this email and any attachments.

From: Ashley E. Walters <AWalters@messner.com>

Sent: Monday, May 19, 2025 12:31 PM

To: Mysty D. Langford <mlangford@richardharrislaw.com>

Cc: Karie Wilson <KWilson@messner.com>; Peggy Dale <PDale@messner.com>; Eric Siegler <esiegler@richardharrislaw.com>; Michael Madden <MMadden@messner.com>

Subject: RE: Chian v. State Farm, et al. - 2:25-cv-00138-CDS-BNW - Discovery Plan